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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

Re: Docket No. 1303, 1337, and 1371

**OFFICIAL COMMITTEE OF UNSECURED CREDITORS' JOINDER AND
RESERVATION OF RIGHTS TO THE DEBTORS' REQUEST FOR
ENTRY OF AN ORDER PURSUANT TO 11 U.S.C. § 105 AND FED. R. BANKR.
P. RULE 2004 (I) AUTHORIZING THE EXAMINATION OF DIGITAL
CURRENCY GROUP, INC. AND DCG INTERNATIONAL
INVESTMENTS, LTD. AND (II) GRANTING RELATED RELIEF**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); and Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these chapter 11 cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

The Official Committee of Unsecured Creditors (the “**Committee**”) of the debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”) respectfully submits this Joinder and Reservation of Rights to the *Debtors’ Request for Entry of an Order Pursuant to 11 U.S.C. § 105 and Fed. R. Bankr. P. Rule 2004 (I) Authorizing the Examination of Digital Currency Group, Inc. and DCG International Investments, Ltd. and (II) Granting Related Relief*, dated February 12, 2024 [ECF No. 1303] (the “**Rule 2004 Motion**”).² In support of this Joinder and Reservation of Rights, the Committee respectfully states as follows:

1. The Committee joins in the Debtors’ requested relief under Rule 2004 of the Federal Rules of Bankruptcy Procedure, as well as the Debtors’ arguments in support of the Rule 2004 Motion.

2. As set forth in the Rule 2004 Motion, the Debtors have shown good cause for examination of the DCG Parties pursuant to Rule 2004. The information sought from the DCG Parties directly relates to the “act, conduct, or property . . . of the debtor . . . or to any matter which may affect the administration of the debtor’s estate,” Fed. R. Bankr. P. 2004(b), and concerns a significant amount of indebtedness owed by DCG, the largest obligor to the Debtors’ estates.

3. The Committee believes that its statutory duty to unsecured creditors in these chapter 11 cases requires that it independently review the information sought by the Debtors and that it participate in any and all related examinations of the DCG Parties. Accordingly, the Committee requests a copy of all materials provided to the Debtors related to the Rule 2004 Motion, which the Committee agrees to receive on a professionals’ eyes only basis.

4. The Committee expressly reserves all rights related to the Rule 2004 Motion, including the right to supplement or amend this Joinder and Reservation of Rights and to present

² Capitalized terms used but not otherwise defined herein have the meaning as set forth in the Rule 2004 Motion.

evidence at the hearing to consider the Rule 2004 Motion, whether as a result of ongoing discovery or otherwise.

WHEREFORE, the Committee respectfully requests that the Court (i) grant the Rule 2004 Motion, (ii) permit the Committee to have access to any information produced with respect to the Rule 2004 Motion and the ability to participate in any examination, and (iii) grant the Committee such other and further relief as is just, proper, and equitable.

Dated: March 20, 2024
New York, New York

Respectfully submitted,

By: /s/ J. Christopher Shore

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